



Kimberley Process Policy Rubin & Zonen Bvba

We will not knowingly buy or sell Conflict Diamonds or assist others to do so.

Therefore:

1. We apply the rough Diamond Export and Import Verification System and controls as laid out by the Kimberley Process Certification Scheme and relevant national legislation.
2. We keep records of Kimberley Process Certificates for rough Diamonds.
3. Our Kimberley Process certificates are audited and reconciled by our independent auditor on an annual basis, which can be used to prove compliance with the Kimberley Process.
4. We fully adhere to the principles of the "World Diamond Council Resolution on Industry Self-Regulation".
5. All our invoices for Diamonds, contain the World Diamond Council warranty statement ["The Diamonds herein invoiced have been purchased from legitimate sources not involved in the funding of conflict and in conformance with United Nations resolutions. The seller hereby guarantees that these Diamonds are conflict free, based on personal knowledge and/or written guarantees provided by the Supplier of these Diamonds."]. Records of all such invoices are kept.
6. We do not purchase from sources that do not provide the World Diamond Council warranty statement on their invoices.
7. We provide training to all relevant Employees who buy or sell Diamonds about government restrictions on the trade in Conflict Diamonds, the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties

Antwerp June 30th, 2012

A handwritten signature in black ink, appearing to read 'R. Rubin', is written over a horizontal line.

Raphaël Rubin
CEO Rubin & Zonen Bvba